

Remarks

Favorable reconsideration of this application is requested in view of the following remarks. For the reasons set forth below, Applicant respectfully submits that the claimed invention is allowable over the cited references.

The non-final Office Action dated August 23, 2005, indicated that the drawings are objected to; the Abstract is objected to; claim 10 is objected to based on a definition of the term cassette; claims 9 and 10 are rejected under 35 U.S.C. § 112(2); claims 1-2, 8 and 9-10 are rejected under 35 U.S.C. § 102(b) over Kato (U.S. Patent No. 5,206,627); claims 1-2, 8 and 9-10 are rejected under 35 U.S.C. § 102(b) over Yap et al. (U.S. 5,246,218); claims 1-2, 6-8 and 10 are rejected under 35 U.S.C. § 102(b) over Snell (U.S. Patent No. 6,152,435); claims 1-2, 4-5 and 7-9 are rejected under 35 U.S.C. § 102(b) over Engibarov (U.S. Patent No. 5,060,920); and claims 3 and 6 are rejected under 35 U.S.C. § 103(a) over Engibarov in view of McConkey (U.S. Patent No. 5,074,536).

Applicant has canceled claims 9 and 10 without prejudice; therefore, the objection to the drawings, the objection to the Abstract, the objection to claim 10, and the Section 112 rejection are moot.

Regarding the amendment to claim 1, Applicant has maintained that certain claim limitations relating to the cassette cannot be ignored. Applicant's amendment to claim 1 recharacterizes the invention as an "arrangement" that includes the cassette, and in this regard the scope of claim 1 does not change. As is discussed further below, the claimed invention is to be considered "as a whole" – including all limitations.

The Prior Art Rejections

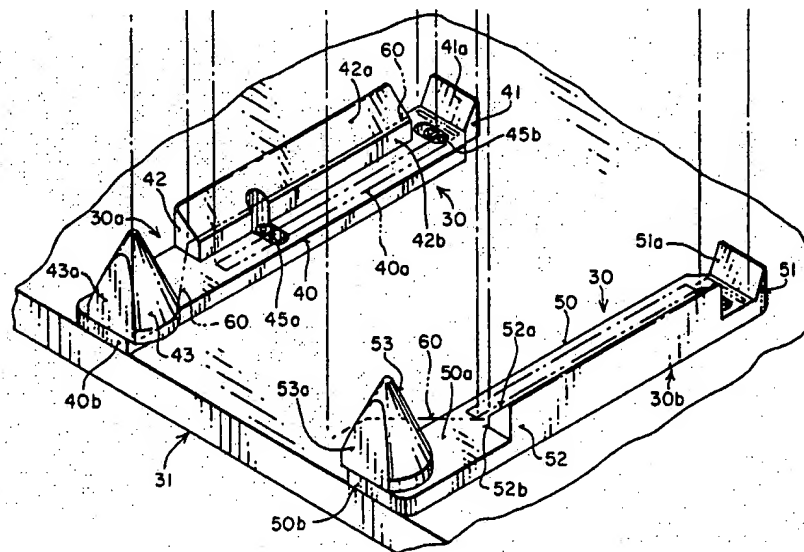
Applicant respectfully traverses each of the prior art rejections because none of the references cited in the Office Action correspond to the claimed invention. These deficiencies are explained below in connection with each cited reference. Moreover, with respect to claim 8 (rejected in view of each of the references due to the relativity of the term "low coefficient of friction"), Applicant has amended claim 8 to further characterize the term "low coefficient of friction" relative to its material which is polyethylene. Applicant notes that MPEP § 2173.02 requires that the claims be considered in view of the Specification which at page 5, lines 23-25, identifies one example of a material giving real meaning to "low coefficient of friction."

The '627 Reference

Applicant respectfully traverses the rejection of claims 1-2, 8 and 9-10 in view of the '627 reference because the Office Action fails to present a reference that corresponds to the claimed invention. More specifically, the Office Action fails to identify where the '627 reference teaches a "guide member having cassette-directed guides." The Office Action erroneously asserts that the reference numerals 6 and 7 refer to "two guides." Contrary to the Examiner's assertion, the '627 reference indicates only one guide 7 having grooves 6. *See* column 4, line 4. Without a presentation of correspondence to each of the claimed limitations, the Section 102(b) rejection cannot be maintained. Accordingly, Applicant requests that the rejection be withdrawn.

The '218 Reference

Applicant respectfully traverses the rejection of claims 1-2, 8 and 9-10 in view of the '218 reference because the Office Action fails to present a reference that corresponds to the claimed invention. The Examiner appears to rely on the holder embodiment shown in the bottom portion of Fig. 3, reproduced below.



The Office Action fails to identify where the two asserted guides (30a and 30b) include the claimed respective protruding end portions and "the respective end portion of each guide has a first side of the guide member which is facing away from the base plate and second side of the guide member facing toward the base plate, the first and second sides

tapered toward one another in a direction toward the protruding end portion so as to form the respective protruding end portion.” None of the features shown in Fig. 3 illustrate such a configuration. For example, inner side surfaces 42a and 52a do not have corresponding second side portions facing toward the base plate. Without a presentation of correspondence to each of the claimed limitations, the Section 102(b) rejection is improper and should be withdrawn.

The ‘435 Reference

Applicant respectfully traverses the rejection of claims 1-2, 6-8 and 10 in view of the ‘435 reference because the Office Action fails to present a reference that corresponds to the claimed invention. The Examiner has admitted that the reference fails to teach or suggest using the ‘435 vice clamp to hold a semiconductor storage cassette. *See* page 2 of the January 5th Office Action.

The Office Action also continues to fail to allege that, or identify where, the ‘435 reference teaches a protruding end portion, as claimed. As discussed in the Appeal Brief filed on May 26, 2005, the ‘435 reference fails to include any teachings that could correspond to the claimed invention. For example, the Office Action relies upon the ‘435 embodiment of Fig. 3B (also shown in Fig. 5), as reproduced below.

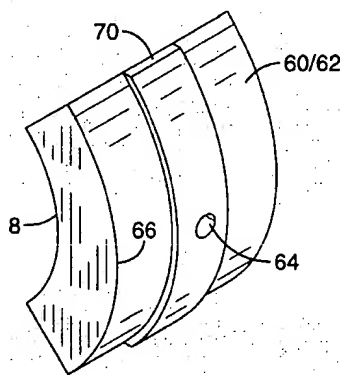


FIG. - 3B

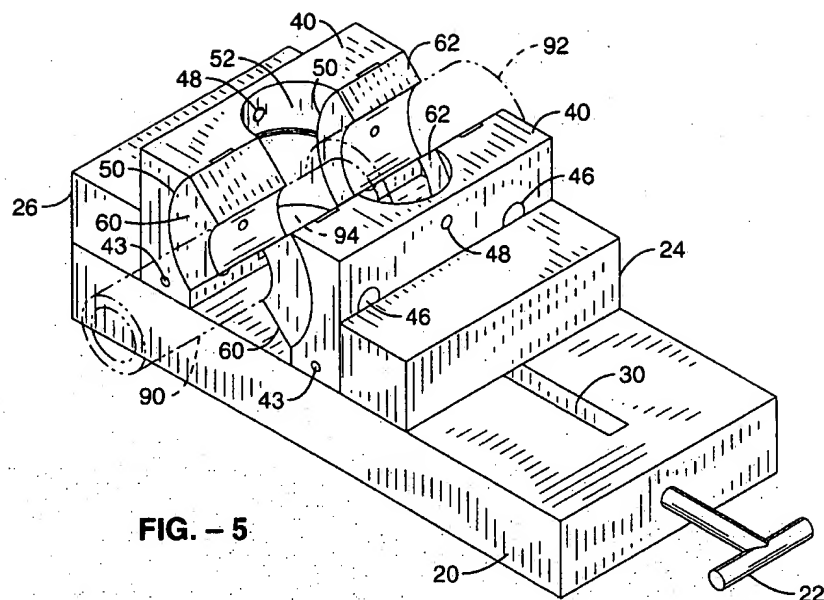


FIG. - 5

As shown above, this embodiment is a vice clamp that has nothing to do with a holder arrangement for semiconductor cassettes, as claimed. Moreover, the claimed invention requires, "the first and second sides tapered toward one another in a direction toward the protruding end portion so as to form the respective protruding end portion." Assuming that the Examiner is relying on the apparently tapered edges of the collet pad shown in Fig. 3B, Applicant notes that the edges do not taper to form anything and instead end with a gap and an indentation between them. The Examiner fails to show any correspondence to the claimed protruding end portions in the '435 reference and fails to even acknowledge that for various embodiments the protruding end portion can play an important role in providing consistent alignment for semiconductor substrate cassettes. Without an assertion or presentation of correspondence, the Examiner fails to present a *prima facie* case of rejection.

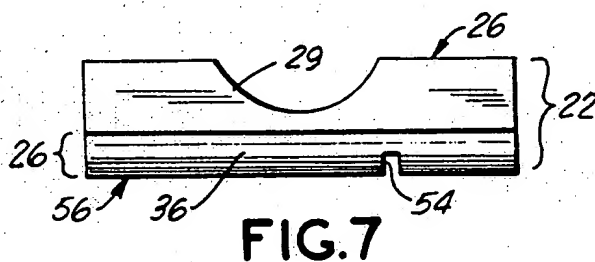
Moreover, the Examiner fails to assert or present correspondence to several dependent claim limitations. With respect to claim 2, the Office Action fails to identify how the '435 vice clamp is mirror symmetrical with respect to the side facing the base plate and the opposite side facing away from the base plate. At least hole 48 of Fig. 1A would appear to destroy any such symmetry. Regarding claim 7, the Office Action fails to identify how the '435 vice clamp guide member "adjoins a single side of the cassette," as claimed.

Without a presentation of correspondence to each of the claimed limitations, the Section 102(b) rejection in view of the '435 reference is improper, and Applicant accordingly requests that the rejection be reversed.

The '920 Reference

Applicant respectfully traverses each of the prior art rejections (Section 102(b) and 103(a)) in view of the '920 reference because the Office Action fails to present a reference that corresponds to the claimed invention. The Examiner has admitted that the reference fails to teach or suggest using the '920 jaw assembly to hold a semiconductor storage cassette. See page 3 of the January 5th Office Action.

The Office Action fails to allege that, or identify where, the '920 reference teaches "the first and second sides tapered toward one another in a direction toward the protruding end portion so as to form the respective protruding end portion." (e.g., claim 1) As previously discussed in the Appeal Brief and again illustrated below, the cited portion of the '920 reference shows half circle 29 in Fig. 7 cut out of an alleged guide member.



As can be seen, the '920 reference fails to teach: 1) a protruding end portion, 2) sides tapered toward one another to form a protruding end portion, and 3) tapered sides of the guide member facing toward and away from the base plate. The half circle 29 faces perpendicular to the alleged base plate of the '920 reference. Fig. 9 also fails to correspond to these limitations as cut-outs 66 and 68 merely replace the single cut-out 29 of Fig. 7. Without even an assertion of correspondence, the Examiner fails to present a *prima facie* case of rejection and the prior art rejections cannot be maintained. Applicant accordingly submits that the rejections should be reversed.


Moreover, the Examiner fails to identify any evidence that the skilled artisan would modify the jaw assembly of the '920 reference with the flange tool of the '536

reference. The flange tool is used to connect large diameter pipe sections. Applicant fails to recognize how the Examiner proposes to introduce the flange tool to the '920 jaw assembly which does not appear to include any pipe sections of large diameter. In order to present a proper Section 103(a) rejection, the Examiner must present evidence of motivation or suggestion to modify the cited references. *See* MPEP § 2143. Without this requisite evidence, the rejection is improper and should be reversed.

In view of the remarks above, Applicant believes that each of the rejections has been overcome and the application is in condition for allowance. Should there be any remaining issues that could be readily addressed over the telephone, the Examiner is asked to contact the agent overseeing the application file, Mr. Peter Zawilski, of Philips Corporation at (408) 474-9063.

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